UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DENNIS KOESTERER, on behalf of himself and all others similarly situated,
 	
        Plaintiff,
 	
   v.
 	
WASHINGTON MUTUAL, INC., KERRY K. KILLINGER, DAVID C. SCHNEIDER and THOMAS W. CASEY,
 	
        Defendants.
	Civil Action No.: 07-cv-09801 (CM)

JOEL ABRAMS and BRIAN ROFFE, on behalf of himself and all others similarly situated,
 	
        Plaintiff,
 	
   v.
 	
WASHINGTON MUTUAL, INC., KERRY K. KILLINGER, DAVID C. SCHNEIDER and THOMAS W. CASEY,
 	
        Defendants.
	Civil Action No.: 07-cv-09806 (AKH)
	
	THE MASSACHUSETTS PENSION RESERVES INVESTMENT MANAGEMENT BOARD'S MOTION FOR (1) APPOINTMENT AS LEAD PLAINTIFF, (2) APPROVAL OF ITS SELECTION OF COUNSEL AS LEAD COUNSEL FOR THE CLASS, AND (3) CONSOLIDATION OF ALL RELATED ACTIONS

ROBERT L. GARBER individually and on behalf of all others similarly situated,
 	
        Plaintiff,
 	
   v.
 	
WASHINGTON MUTUAL, INC., KERRY K. KILLINGER, STEPHEN J. ROTELLA, and THOMAS W. CASEY,
 	
        Defendants.
	Civil Action No.: 07-11422 (UA)

The Massachusetts Pension Reserves Investment Management Board ("PRIM"), by its counsel, hereby respectfully moves this Court to: (i) consolidate all related actions; (ii) be appointed Lead Plaintiff in the consolidated securities class action; and (iii) approve its selection and retention of Berman DeValerio Pease Tabacco Burt & Pucillo as Lead Counsel.

In support of this Motion, PRIM submits herewith a Memorandum of Law, the Declaration of Jeffrey C. Block, and a Proposed Order.

Dated: January 4, 2008   Respectfully submitted,

ZWERLING, SCHACHTER &
   ZWERLING, LLP

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Counsel for PRIM and Proposed Lead Counsel for the Class

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